

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

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OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

August 19, 2014

Maggie Seaberg Upper North Fork ID Team Leader P.O. Box 180 11 Casey Road North Fork, Idaho 83466

RE:

EPA comments on the Upper North Fork Healthy Forest Restoration Act Ecosystem Restoration Project Final Environmental Impact Statement (EIS) and Draft Record of Decision (ROD), EPA Project # 11-4119-AFS.

Dear Ms. Seaberg:

We have reviewed the above-mentioned documents in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

In our May 5, 2014, letter on the Draft EIS, we rated the document "LO" (Lack of Objections) and identified Alternative 2, No New Temporary Roads, as environmentally preferable. We recommended that if Alternative 1, Proposed Action, was selected, however, that the Forest Service avoid temporary road construction unless it could be demonstrated that such construction would result in less impact, particularly in the long-term. We also recommended that water quality monitoring be identified in the ROD, as well as information for replanting for resiliency and use of ICO (individual, clumps and openings) for thinning.

The Draft ROD identifies Alternative 1, Proposed Action, as the selected alternative. This decision is based primarily on the analysis showing that without new temporary roads, areas in need of treatment, specifically those identified for helicopter access, may not be accessible or economic to treat. We recognize the importance of this project, not only for overall forest health, but also for the benefit of communities in, and in close proximity to, the project area. We also recognize that Alternative 1 generally has a positive effect on fire conditions, species composition and structure, and resiliency to insect and disease. We are encouraged that the Draft ROD identifies implementation and effectiveness monitoring, in addition to third-party monitoring by the Lemhi County Forest Restoration Group. We recommend identification of financial and in-kind commitments to guarantee implementation of this monitoring.

Thank you for the opportunity to review the Final EIS and Draft ROD. If you have any questions concerning our comments, please contact Jennifer Curtis of my staff in Anchorage, Alaska, at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely, Partini B. Seichott

Christine B. Reichgott, Manager

Environmental Review and Sediments Management Unit